

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,)
Plaintiff,)
)
vs.) CASE No. 19-00003-CR--W-BP
)
JAMES FRANCIS JORDEN, II)
Defendant.)

**DEFENDANT'S CONSENT MOTION FOR EXTENSION OF DEADLINE TO FILE
OBJECTIONS TO PRESENTENCE REPORT**

COMES NOW defendant James Francis Jorden II, by and through appointed counsel, and moves this Honorable Court to enter an Order extending the deadline to file objections to the preliminary presentence report to January 24, 2020. As grounds for this motion, counsel submits the following memorandum.

MEMORANDUM IN SUPPORT

1. On September 20, 2019, Mr. Jorden entered a plea of guilty to one Count of conspiracy to distribute 500 grams or more of methamphetamine and one Count of conspiracy to commit money laundering.
2. On December 19, 2019, the probation office published its preliminary presentence investigation report. Objections are currently due on January 8, 2020.
3. Due to other commitments, undersigned counsel will need additional time to schedule a meeting and discuss the report with her client, evaluate the preliminary presentence report, and draft and finalize any objections or suggested additions to the report, and is thus requesting an extension up to and including January 24, 2020.

4. The brief additional extension of the deadline to file objections for Mr. Jorden will not unduly delay the resolution of this matter, as this Court recently continued the sentencing date in this matter to April 14, 2020.
5. The undersigned counsel has communicated regarding this motion with Assistant United States Attorney Bruce Rhoades. Mr. Rhoades indicated the government does not object to this request for extension of time.

WHEREFORE, based on the foregoing, defendant Rhoades respectfully requests that the Court issue an Order extending the deadline to file objections to the presentence report to January 24, 2020.

Respectfully Submitted,

Holman Schiavone LLC

By: /s/ Ashley H. Atwell-Soler

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COUNSEL FOR JAMES F. JORDEN

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of December, 2019 I electronically filed the foregoing with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Ashley H. Atwell-Soler

Attorney for Defendant